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Via ECF

Honorable Andrew L. Carter, Jr.
United States District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Pedro Rojas-Romero
16 Cr 324 (ALC)

Dear Judge Carter, Jr.:

I am the CJA Appointed Counsel for Mr. Rojas-Romero. The purpose of this letter is to respectfully request an adjournment of our sentencing hearing that is scheduled for April 3rd at 11 a.m.

As the Court is aware, we received authorization to retain the Consulting Group and Mr. Reynaldo Cusicanqui to serve as the mitigation specialist for Mr. Rojas-Romero. To date, Mr. Cusicanqui and his team continue to gather and translate documents received from family and friends as well as scheduling meetings to further develop other relevant mitigation material. We continue to believe that this material will assist the Court in formulating a sentence that is sufficient, but not greater than necessary to comply with the purpose of sentence set forth in 18 U.S.C. § 3553(a).

Additionally, in light of the current COVID-19 virus crisis and the recent BOP visitation policy, access to Ms. Rivas is expected to remain restricted and therefore request a 90-day adjournment of Mr. Rojas-Romero's upcoming sentencing hearing. We of course believe that Mr. Rojas-Romero's interests are best served if we have the additional time to allow Mr. Cusicanqui and his team to complete the mitigation report and thereafter counsel submission.

Know also that I consulted with AUSA Jacqueline Kelly in advance of this request and she advised that the government has no objection to the adjournment. Should the Court grant this request, counsel is requesting that the hearing be adjourned to the week of June 29th.

Thank you in advance for any and all consideration of this request. We will await further instructions from the Court on this matter.

Respectfully,

A. James Bell
A. James Bell, Esq.

Application granted. Sentencing adjourned to
6-30-20 at 2 p.m.

So Ordered.
Andrew J. Cant
3-19-20